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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE iPHONE/iPAD
APPLICATION CONSUMER
PRIVACY LITIGATION) Case No.: 5:11-MD-02250-LHK
)
) **DECLARATION OF DEBORAH**
) **KRAVITZ IN SUPPORT OF**
) **PLAINTIFFS' CLASS**
) **CERTIFICATION REPLY**

Hearing
Date: October 31, 2013
Time: 1:30 pm
Courtroom: 8 – 4th Floor
Judge – Hon. Lucy H. Koh

1 I, Deborah Kravitz, declare as follows:

2 1. I am senior counsel at KamberLaw, LLP, and a member of the bar of the
3 States of California and Maryland, and the District of Columbia, and am fully familiar
4 with the proceedings in this matter.

5 2. I make this declaration in support of Plaintiffs' Reply in Support of
6 Plaintiffs Class Certification Reply and based on personal knowledge. I am competent to
7 testify to the matters set forth here, and would testify to the matters as set forth here if
8 called upon to do so.

9 3. Attached as Exhibit 1 is a true and correct copy of excerpts of the
10 deposition of Jane Horvath, Director of Global Privacy at Apple, dated October 4, 2013.

11 4. Attached as Exhibit 2 is a true and correct copy of excerpts of the
12 deposition of Phillip Shoemaker, Director of App Store Review at Apple, dated October
13 4, 2013.

14 5. Attached as Exhibit 3 is a true and correct copy of excerpts of the
15 deposition of Phillip Shoemaker, Director of App Store Review at Apple, dated October
16 7, 2013.

17 6. Attached as Exhibit 4 is a true and correct copy of the Apple user profile
18 for Anthony Chiu, stamped APPLE_0003993 through APPLE_0004019.

19 7. Attached as Exhibit 5 is a true and correct copy of the Apple user profile
20 for Cameron Dwyer, stamped APPLE_004020 through APPLE_004062.

21 8. Attached as Exhibit 6 is a true and correct copy of the Apple user profile
22 for Isabella Capiro, stamped APPLE_0027517 through APPLE_0027560.

23 9. Exhibit 7 is intentionally left blank.

24 10. Attached as Exhibit 8 is a true and correct copy of an internal Apple
25 document stamped APPLE_1040451 through APPLE_1040453.

26 11. Attached as Exhibit 9 is a true and correct copy of an internal Apple email
27 exchange stamped APPLE_1040474 through APPLE_1040479 dated October 25, 2011.

28 12. Attached as Exhibit 10 is a true and correct copy of an email exchange

1 from P. Shoemaker to D. Arno and others stamped APPLE_1007370 through
2 APPLE_1007371 dated October 12, 2010.

3 13. Attached as Exhibit 11 is a true and correct copy of a Power Point
4 Presentation titled “UDID Endgame” stamped APPLE_9599964 through
5 APPLE_9599987.

6 14. Attached as Exhibit 12 is a true and correct copy of excerpts of the
7 deposition of Phillip Shoemaker, Director of App Store Review at Apple, dated
8 November 8, 2012.

9 15. Attached as Exhibit 13 is a true and correct copy of an email exchange
10 between P. Shoemaker, A. Louv and others, stamped APPLE_1052018 through
11 APPLE_1052021, dated October 4, 2011.

12 16. Attached as Exhibit 14 is a true and correct copy of an email exchange
13 between J. Geleynse and A. Schaffer stamped APPLE_1139023 through
14 APPLE_1139026 dated April 2, 2012.

15 17. Attached as Exhibit 15 is a true and correct copy of an email exchange
16 between P. Shoemaker, R. Chipman and others, stamped APPLE_9599959 through
17 APPLE_9599960 dated May 29, 2013.

18 18. Attached as Exhibit 16 is a true and correct copy of an internal Apple
19 document titled “App Store Review Guidelines,” stamped APPLE_9592945 through
20 APPLE_9592953, dated 2013.

21 19. Attached as Exhibit 17 is a true and correct copy of an email exchange
22 between Michael McMillion and Shaan Pruden stamped APPLE_2265903 through
23 APPLE_2265906 dated November 17, 2011.

24 20. Attached as Exhibit 18 is a true and correct copy of a multi-tab
25 spreadsheet from Apple titled “131003 TI Data Pull” stamped APPLE_9599664 and
26 produced October 4, 2013.

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1 I declare under penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct.

3 Executed on October 10, 2013, at Sonoma County, California.

4 By:

5 /s/ Deborah Kravitz
6 Deborah Kravitz

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